

EXHIBIT #2

7:25mj107

**THE MATERIAL FACTS CONSTITUTING PROBABLE CAUSE THAT
THE SEARCH SHOULD BE MADE ARE:**

On May 27, 2025, Virginia State Police Narcotic Detector Canine "Mario," VSPN 309, was utilized to check a United States Postal Service Priority Mail parcel. The parcel is bearing tracking number 9405 5301 0935 5155 8393 23. The parcel is addressed from Jesus Aragon, 1313 Sandra Dr., Bakersfield, CA 93304. The parcel was being sent to Derek Ferguson, 2097 Pisgah Rd., Goode, VA 24556. The parcel was located at the United States Postal Service Office at the address of 419 Rutherford Avenue NE Roanoke, VA 24022. On 5/27/2025, at approximately 1120 hours, Narcotic Detector Canine "Mario," VSPN 309 alerted in the presence of the affiant to the odor of narcotics on the above-described parcel in a blind parcel lineup. The alert was confirmed by Trooper J.T. Nicley. Trooper J.T. Nicley was the handler in control of the Narcotic Detector Canine "Mario," VSPN 309 at the time of the alert. Trooper J.T. Nicley is a trained canine handler and is trained in the handling of Canine "Mario," VSPN 309, and the interpretation of the reaction of Canine "Mario," VSPN 309 to the odor of illegal drugs.

**THE RELIABILITY OF THE NARCOTIC DETECTOR CANINE IS
ADJUDGED BY THE FOLLOWING:**

Trooper J.T. Nicley who is employed by the Virginia State Police and has been a Trooper since September 2018. Trooper J.T. Nicley has been a canine handler since 2024. Trooper J.T. Nicley advised this affiant that Narcotic Detector Canine "Mario," VSPN 309, was trained at the Virginia State Police Narcotic Detector Canine/Handler course in Richmond, Virginia and certified on November 19, 2024. On April 14, 2025, Trooper J.T. Nicley and Narcotic Detector Canine "Mario," VSPN 309, re-certified reliable in the detection of cocaine, heroin, methamphetamine, and ecstasy. Canine "Mario," VSPN 309, receives monthly in-service training and a minimum of four hours of training each week. Trooper J.T. Nicley advised this affiant that since Canine "Mario," VSPN 309, certified, he has been utilized several times and has alerted to the odors of illegal narcotics during training assignments.

Pursuant to 28 USC 1746, I declare under the penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.



Trooper J.T. Nicley
Virginia State Police

Date

